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Additional Counsel on next page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JOSEPH TAYLOR, EDWARD MLAKAR,
MICK CLEARY, EUGENE ALVIS, and
JENNIFER NELSON, individually and on
behalf of all others similarly situated,

Plaintiffs.

V

GOOGLE LLC,

Defendant.

Case No. 5:20-cv-07956-VKD

**L.R. 6-2 STIPULATED REQUEST TO
EXTEND CASE DEADLINES AND
[PROPOSED] ORDER**

Judge: Hon. Virginia K. DeMarchi

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1 Pursuant to this Court's Case Management Order (ECF No. 99) and Civil L.R. 6-2, Plaintiffs
 2 Joseph Taylor, Edward Mlakar, Mick Cleary, Eugene Alvis, and Jennifer Nelson ("Plaintiffs") and
 3 Defendant Google LLC ("Google") (collectively, the "Parties"), by and through their respective
 4 counsel, hereby stipulate and agree as follows:

5 **WHEREAS**, the close of expert discovery in this matter was scheduled for April 8, 2025
 6 (ECF No. 187);

7 **WHEREAS**, the current deadline for any Party to file a non-*Daubert* motion related to
 8 expert discovery is April 15, 2025 (ECF No. 187);

9 **WHEREAS**, the current deadline for Class Certification and Expert Challenges
 10 Oppositions is April 17, 2025 (ECF No. 164);

11 **WHEREAS**, the current deadline for Class Certification and Expert Challenges Replies is
 12 May 13, 2025 (ECF No. 164);

13 **WHEREAS**, the current date for the Class Certification and Expert Challenges Hearing is
 14 July 1, 2025 (ECF No. 164);

15 **WHEREAS**, the current deadline for Motions for Summary Judgment is September 9, 2025
 16 (ECF No. 164);

17 **WHEREAS**, the current deadline for Motions for Summary Judgment Oppositions is
 18 October 7, 2025 (ECF No. 164);

19 **WHEREAS**, the current deadline for Motions for Summary Judgment Replies is October
 20 28, 2025 (ECF No. 164);

21 **WHEREAS**, the current date for the hearing on Motions for Summary Judgment is
 22 November 18, 2025 (ECF No. 164);

23 **WHEREAS**, the Parties have agreed to extend the deadline to hold expert depositions by
 24 14 days, from April 8, 2025 to April 22, 2025;

25 **WHEREAS**, the Parties have agreed to extend the deadline to file any non-*Daubert* motions
 26 related to discovery by 14 days, from April 15, 2025 to April 29, 2025;

27 **WHEREAS**, the Parties have agreed to extend the deadline for Class Certification and
 28 Expert Challenges Oppositions by 20 days, from April 17, 2025 to May 7, 2025;

1 **WHEREAS**, the Parties have agreed to extend the deadline for Class Certification and
 2 Expert Challenges Replies by 56 days, from May 13, 2025 to July 8, 2025;

3 **WHEREAS**, the Parties have agreed to continue the Class Certification and Expert
 4 Challenges Hearing by 21 days, from July 1, 2025 to July 22, 2025 (subject to the Court's
 5 availability);

6 **WHEREAS**, the Parties have agreed to extend the deadline for Motions for Summary
 7 Judgment by 21 days, from September 9, 2025 to September 30, 2025;

8 **WHEREAS**, the Parties have agreed to extend the deadline for Motions for Summary
 9 Judgment Oppositions by 21 days, from October 7, 2025 to October 28, 2025;

10 **WHEREAS**, the Parties have agreed to extend the deadline for Motions for Summary
 11 Judgment Replies by 21 days, from October 28, 2025 to November 18, 2025;

12 **WHEREAS**, the Parties have agreed to continue the hearing on Motions for Summary
 13 Judgment by 21 days, from November 18, 2025 to December 9, 2025 (subject to the Court's
 14 availability); and

15 **WHEREAS**, for the reasons set forth in the Declaration of Whitty Somvichian in Support
 16 of the L.R. 6.2 Stipulated Request for Order Extending Case Deadlines (attached hereto as Exhibit
 17 A), the Parties jointly agree that good cause exists to grant the extension of time, including because:
 18 (1) the Parties have exercised diligence in attempting to hold expert depositions by the existing
 19 deadlines; (2) the Parties are actively litigating both this matter and the concurrent *Csupo v. Google*
 20 LLC matter in Superior Court in Santa Clara County, which raises materially the same claims at
 21 issue in this litigation, and which is set for trial on June 2, 2025; (3) the Parties have negotiated
 22 extensively regarding the issues driving this request and have made every effort to resolve any
 23 underlying disputes without Court intervention; (4) the requested extensions will not impact the
 24 trial date set in this case; and (5) the requested extensions are in the interests of both Parties, their
 25 experts, and the just and efficient progress of this matter, and are critical to the Parties' ability to
 26 present the most helpful briefing and presentations to this Court.

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1 **NOW, THEREFORE**, the Parties, by and through their respective counsel, stipulate and
 2 agree that the following revisions should be made to the case schedule:

Event	Current Deadline	Stipulated Deadline
Completion of Expert Depositions	April 8, 2025	April 22, 2025
Motions Related to Expert Discovery	April 15, 2025	April 29, 2025
Class Certification and Expert Challenges Oppositions	April 17, 2025	May 7, 2025
Class Certification and Expert Challenges Replies	May 13, 2025	July 8, 2025
Class Certification and Expert Challenges Hearing	July 1, 2025	July 22, 2025
Motions for Summary Judgment	September 9, 2025	September 30, 2025
Motions for Summary Judgment Oppositions	October 7, 2025	October 28, 2025
Motions for Summary Judgment Replies	October 28, 2025	November 18, 2025
Motions for Summary Judgment Hearing	November 18, 2025	December 9, 2025

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 25 **IT IS SO STIPULATED.**
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1 Dated: April 9, 2025

Respectfully submitted,

2 COOLEY LLP

3
4 By: /s/ Whitty Somvichian
5 Whitty Somvichian6 Attorney for Defendant
7 GOOGLE LLC

8 Dated: April 9, 2025

KOREIN TILLERY LLC

9
10 By: /s/ Chad E. Bell
11 Chad E. Bell

12 Attorney for Plaintiffs

13 **ATTESTATION OF CONCURRENCE IN FILING**14 Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, the undersigned hereby attests
15 that concurrence in the filing of this document has been obtained.

16 Dated: April 9, 2025

COOLEY LLP

17
18 /s/ Whitty Somvichian
19 Whitty Somvichian20 Attorneys for Defendant
21 GOOGLE LLC

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PROPOSED ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: _____

The Honorable Virginia K. DeMarchi
United States District Judge

317493572 v2